

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**BKL HOLDINGS, INC. D/B/A  
LICENSE COACH**

**Plaintiff,**

**V.**

**GLOBE LIFE INC.; AMERICAN INCOME LIFE INSURANCE COMPANY; LIBERTY NATIONAL LIFE INSURANCE COMPANY; FAMILY HERITAGE LIFE INSURANCE COMPANY OF AMERICA; JAMES “BO” E. GENTILE, JR.; and DAVID ZOPHIN.**

**Defendants.**



**Civil Action No. 4:22-cv-00170-ALM**

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR  
PLAINTIFF BKL HOLDINGS, INC. D/B/A LICENSE COACH**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW Richard W. Winn (“Winn”) and Friedman & Feiger, LLP (the “Firm”) (collectively “Movants”), and files this, Unopposed Motion to Withdraw as Counsel of Record for Plaintiff BKL Holdings, Inc. d/b/a License Coach (License Coach”) and for cause would respectfully show unto the Court as follows:

1. Movants are counsel of record for License Coach in the above-styled and numbered lawsuit.
2. Pursuant to Local Rule 11(c), Movants request this Court grant them leave to withdraw from representing License Coach in this action. “Cause” exists in that (1) withdrawal can be accomplished without material adverse effect on the interests of the client and (2) there is

a disagreement with License Coach concerning the engagement agreement between License Coach and the Firm and *See, Texas Disciplinary Rule of Professional Conduct* 1.15(b)(1) and (5).

3. The respective Counsel for the Corporate Defendants and Individual Defendants do not oppose this motion. Movants contacted License Coach several weeks ago as to Movants' intention to withdraw and whether License Coach agrees to this withdrawal. License Coach does not oppose this Motion. Movants do not know yet if another attorney or law firm will be substituted as counsel in place of Movants but have been informed that License Coach intends to engage other counsel.

WHEREFORE, PREMISES CONSIDERED, Movants Richard W. Winn and Friedman and Feiger, LLP respectfully pray that the Court enter an order discharging Movants as attorney of record for Plaintiff BKL Holdings, Inc. d/b/a License Coach, and for such other and further relief to which Movants may show themselves entitled.

Respectfully submitted,

/s/ Richard W. Winn  
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**ATTORNEYS FOR PLAINTIFF  
BKL HOLDINGS, INC.**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on April 6, 2023, I contacted Mr. Jeffrey Hammer of King & Spaulding, attorneys for the Corporate Defendants and Ms. Ann Marie Arcadi, attorneys for the Individual Defendants, who stated that they were unopposed to this Motion. The Motion is therefore submitted to the Court for its consideration.

/s/ Richard W. Winn  
Richard W. Winn

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2023 a true and correct copy of the foregoing document was served on all counsel of record in accordance with the Federal Rules of Civil Procedure, via e-filing.

/s/ Richard W. Winn  
Richard W. Winn